

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

-against-

No. 11 Cr. 340 (ERK)

MOUSA KHOULI, *et al.*,

**NOTICE OF DEFENDANT
SALEM ALSHDAIFAT'S
PRETRIAL MOTIONS**

Defendants,

SALEM ALSHDAIFAT,

Defendant-Movant

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PLEASE TAKE NOTICE THAT, upon the Memorandum of Law and the Affirmation of Henry E. Mazurek, Esq., and the exhibits annexed and referenced therein, the defendant Salem Alshdaifat will move this Court before the Honorable Edward R. Korman, United States District Judge, at the United States Courthouse for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York, at a date and time convenient to the Court, for an **ORDER:**

- 1) Dismissing all counts of the Indictment;
- 2) Suppressing evidence, including physical and digital search evidence, and post-arrest statements;
- 3) Ordering an evidentiary hearing to resolve any factual disputes related to these motions;
- 4) Compelling the government to produce expert witness discovery and provide timely notice of intent to use any Rule 404(b) evidence;
- 5) Granting leave to join in applicable motions of co-defendant Joseph Lewis; and

6) Granting any other relief that the Court deems just and proper.

Dated: New York, New York
April 30, 2012

Respectfully submitted,

By: /S/
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